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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
Progressive Enterprises, Inc./Castaways Yacht Club
and
The Sunseeker Club in Annapolis, Inc.

-against-

M/Y CUQUITO (Hull ID No. TNRD1719J091), her
engines, tackle, apparel, furniture, equipment, and all
other necessities thereunto appertaining and belonging
in rem, et al.
-----X

CIVIL NO. 08-3553-KMK-GAY

ECF CASE

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Michael B. McCauley, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice
of:

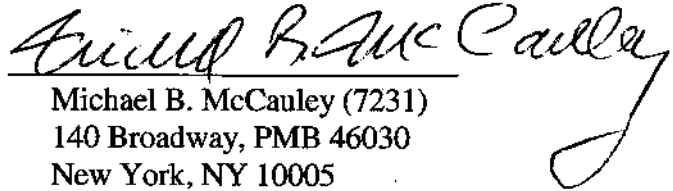
Daniel H. Wooster
Palmer Biezup & Henderson LLP
620 Chestnut Street
Suite 956
Philadelphia, PA 19106
(215) 625-9900
(215) 625-1085 (Fax)

Mr. Wooster is a member in good standing of the Bars of the Commonwealth of
Pennsylvania and the State of New Jersey. A certificate of good standing from each of these
jurisdictions is attached. There is no pending disciplinary proceeding against Mr. Wooster in any
State or Federal Court.

Respectfully submitted,

PALMER BIEZUP & HENDERSON LLP

Dated: July 23, 2008
New York, New York

By: 
Michael B. McCauley (7231)
140 Broadway, PMB 46030
New York, NY 10005
(212) 406-1855
(212) 858-7651 (Fax)
mccauley@pbh.com
Attorneys for Plaintiffs



Supreme Court of Pennsylvania

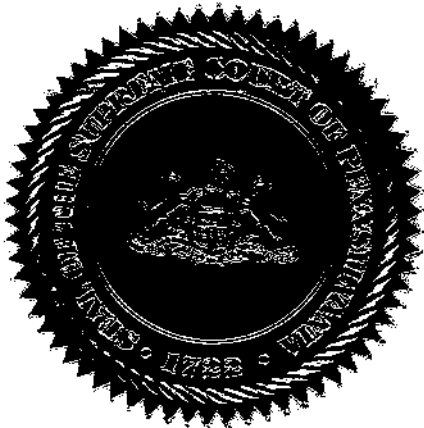
CERTIFICATE OF GOOD STANDING

Daniel Harold Wooster, Esq.

DATE OF ADMISSION

October 27, 2003

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 16, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey

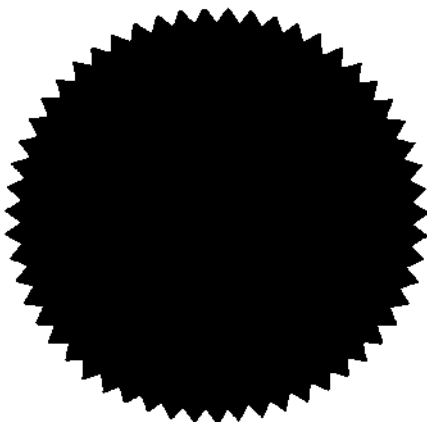


Certificate of Good Standing

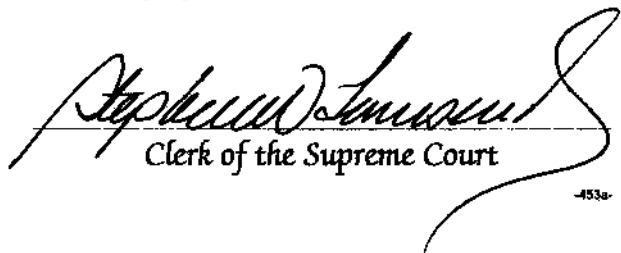
This is to certify that **DANIEL H WOOSTER**
(No. **039462003**) was constituted and appointed an Attorney at Law of New
Jersey on **December 09, 2003** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
17TH day of July , 20 08


Clerk of the Supreme Court

**UNITED STATES DISTRICT COURT
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**DECLARATION OF MICHAEL
B. MCCAULEY IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

-----X
Michael B. McCauley hereby declares as follows:

1. I am counsel for plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of my motion for admission of Daniel H. Wooster as counsel pro hac vice to represent plaintiffs Progressive Enterprises, Inc. and The Sunseeker Club in Annapolis, Inc. in this matter.

2. I am a member in good standing of the bar of the State of New York and am admitted to practice law in Pennsylvania, New Jersey and Delaware. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.

3. I have known Mr. Wooster since 2003.

4. Mr. Wooster is an associate at Palmer Biezup & Henderson's offices in Philadelphia, Pennsylvania and Camden, New Jersey.

5. I have found Mr. Wooster to be a skilled attorney and a person of integrity. He is experienced in Federal Practice and is familiar with the Federal Rules of Civil Procedure.

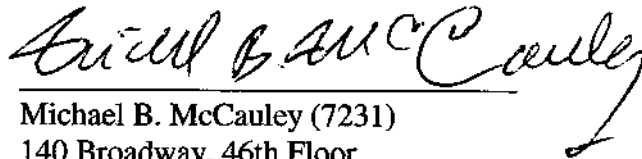
6. Accordingly, I am pleased to move the admission of Daniel H. Wooster, pro hac vice.

7. I respectfully submit the proposed order granting the admission of Daniel H. Wooster, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Daniel H. Wooster, pro hac vice, to represent the plaintiffs in the above referenced matter, be granted.

I declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: July ____, 2008
New York, New York



Michael B. McCauley (7231)
140 Broadway, 46th Floor
PMB 46030
New York, NY 10005
(212) 406-1855
(212) 858-7651 (Fax)
mccauley@pbh.com
Attorneys for Plaintiffs

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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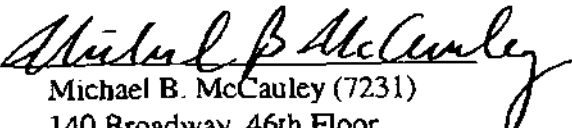
CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of July 2008, a true and correct copy of the foregoing
Motion to Admit Counsel Pro Hac Vice, with supporting Declaration and proposed form of
Order, was served by first-class mail addressed to:

The Sunseeker Club at Castaways, Inc.
425 Davenport Avenue
New Rochelle, NY 10805

The Sunseeker Club in Annapolis, Inc.
846 Shady Oaks Road
West River, MD 20778

PALMER BIEZUP & HENDERSON LLP

By: 
Michael B. McCauley (7231)
140 Broadway, 46th Floor
PMB 46030
New York, NY 10005
(212) 406-1855
(212) 858-7651 (Fax)
mccauley@pbh.com
Attorneys for Plaintiffs

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in rem, et al.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

-----X
Upon the motion of Michael B. McCauley, attorney for plaintiffs and said sponsor
attorney's declaration in support;

IT IS HEREBY ORDERED that

Daniel H. Wooster
Palmer Biezup & Henderson LLP
620 Chestnut Street
Suite 956
Philadelphia, PA 19106
(215) 625-9900
(215) 625-1085 (Fax)

is admitted to practice pro hac vice as counsel for plaintiffs in the above captioned case in
the United States District Court for the Southern District of New York. All attorneys appearing
before this court are subject to the Local Rules of this Court, including the Rules governing
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,
counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall
forward the pro hac vice fee to the Clerk of Court.

Dated: July ____, 2008
White Plains, New York

UNITED STATES DISTRICT JUDGE